

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

<b>TATYANA A. BABAKAEVA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No.: 4:09cv58</b>
	)	
<b>PAUL H. WILSON and</b>	)	
<b>WILSON &amp; WILSON, P.C.,</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION TO COMPEL**

NOW COME the Defendants, Paul H. Wilson and Wilson & Wilson, P.C., by counsel, pursuant to Rule 37(a)(1) of the Federal Rules of Civil Procedure, and move the Court to enter an Order requiring the Plaintiff to more fully and completely respond to the Interrogatories and Request for Production of documents served on her. Prior to filing the Motion the Defendants, through their undersigned counsel, conferred by phone with the Plaintiff in an effort to resolve the objections without success. In support of their Motion, the Defendants rely upon the attached Memorandum of Law.

**PAUL H. WILSON and  
WILSON & WILSON, P.C.**

By: /s/ Douglas E. Miller  
Douglas E. Miller (VSB 38591)  
Veronica E. Meade Sheppard (VSB 66727)  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on October 22, 2009, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following. I also served a true copy of the foregoing via first class mail, postage prepaid on:

Tatyana Babakaeva  
2124 Criston Drive  
Newport News, VA 23602

*Plaintiff, appearing pro se*

/s/ Douglas E. Miller  
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